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**Counsel for PSERS and SERS, and
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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE ROYAL DUTCH/SHELL
TRANSPORT SECURITIES LITIGATION

)
) Civ. No. 04-374 (JAP)
) (Consolidated Cases)
) Hon. Joel A. Pisano
)
) **RETURN DATE:** September 26, 2008
)
) *(Document electronically filed)*
)

**NOTICE OF LEAD PLAINTIFF'S MOTION FOR FINAL APPROVAL OF
SETTLEMENT AND CLASS CERTIFICATION, AND APPROVAL OF
DISTRIBUTION PLAN, ATTORNEYS' FEES AND EXPENSE AWARD, AND
REIMBURSEMENT OF LEAD PLAINTIFF'S COSTS AND EXPENSES**

PLEASE TAKE NOTICE that Lead Plaintiffs the Pennsylvania State Employees' Retirement System ("SERS") and the Pennsylvania Public School Employees' Retirement System ("PSERS" and, together with SERS, "Lead Plaintiff"), by their undersigned attorneys, pursuant to an Order this Court entered into on June 17, 2008, will move before the Honorable Joel A. Pisano, United States District Court Judge, at the United States District Court, Clarkson S. Fisher Building & U.S. Courthouse, 402 East State Street, Trenton, New Jersey, on September 26, 2008 at 11:00 a.m., or as soon thereafter as counsel may be heard, for entry of an Order pursuant to Fed. R. Civ. P. 23(a), (b)(3), (e) and (h):

- a. granting final approval of the Settlement;
- b. certifying the Class for settlement purposes;
- c. approving the Plan of Distribution;
- d. approving the requested award of attorneys' fees and expenses; and
- e. approving the requested reimbursement of Lead Plaintiff's costs and expenses.

The grounds for this motion are further set forth in the following accompanying documents:

- 1. Lead Plaintiff's Memorandum in Support of Final Approval of Settlement Agreement, Plan of Distribution, and Class Certification;
- 2. Lead Plaintiff's Memorandum in Support of an Award of Attorneys' Fees and Reimbursement of Expenses;
- 3. Declaration of Stanley D. Bernstein in Support of Approval of Proposed Class Action Settlement and Payment of Attorneys' Fees and Reimbursement of Expenses; and
- 4. Compendium of Affidavits and Declarations in Support of Lead Plaintiff's Motion for Final Approval of Settlement and Class Certification, and Approval of Distribution Plan, Attorneys' Fees and Expense Award, and Reimbursement of Lead Plaintiff's Costs and Expenses.

WHEREFORE, Lead Plaintiff respectfully requests that this Court enter an Order (1) granting final approval of the Settlement; (2) certifying the Class for settlement purposes; (3) approving the Plan of Distribution; (3) approving the requested \$30 million award of attorneys' fees and \$3 million in reimbursement of expenses; and (4) approving reimbursement of Lead Plaintiff's costs and expenses directly relating to their representation of the Class in the amount of \$150,000.

DATED: September 19, 2008 Respectfully submitted,

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